

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

09 NOV -3 P1:07

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON MOSBY, JAMES CAIN,  
and SHANNAN WILLIS,

Defendants.

JON W. SANFILIPPO  
CLERK  
Case No. 09-CR-276  
[21 U.S.C. §§ 846, 841(a)(1),  
841(b)(1)(A), 841(b)(1)(B), and  
841(b)(1)(C)]

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES:**

1. From approximately January 2004 until December 2006, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDON MOSBY,  
JAMES CAIN, and  
SHANNAN WILLIS**

knowingly and intentionally conspired with each other and with other persons known and unknown to the grand jury to distribute and to possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The offense involved five kilograms or more of a mixture and substance containing cocaine, a Schedule II controlled substance, and 50 grams or more of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES:**

1. On or about October 12, 2006, in the State and Eastern District of Wisconsin,

**SHANNAN WILLIS**

knowingly and intentionally distributed a controlled substance.

2. The offense involved 5 grams or more of a mixture and substance containing cocaine base,  
a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES:**

1. On or about October 30, 2006, in the State and Eastern District of Wisconsin,

**SHANNAN WILLIS**

knowingly and intentionally distributed a controlled substance.

2. The offense involved 5 grams or more of a mixture and substance containing cocaine base,  
a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

**COUNT FOUR**


**THE GRAND JURY FURTHER CHARGES:**

1. On or about November 10, 2006, in the State and Eastern District of Wisconsin,

**BRANDON MOSBY**

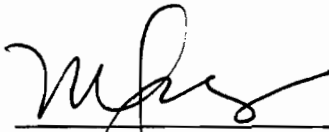
knowingly and intentionally distributed cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (B)(1)(C).

A TRUE BILL:

  
FOREPERSON

Dated:

Nov, 3 2009

  
MICHELLE L. JACOBS  
United States Attorney